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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)

Implementation of the Telecommunications)
Act of 1996:)

CC Docket No. 96-193

Reform of the Filing Requirements and Carrier)
Classifications)

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Anchorage Telephone Utility Petition for)
Withdrawal of Cost Allocation Manual)

AAD 95-91

REPLY COMMENTS OF THE CITIZENS UTILITIES COMPANIES

Citizens Utilities Company, on behalf of itself and its telecommunications divisions and subsidiaries (hereinafter referred to, collectively, as the "Citizens Companies"), by its attorney, hereby submits reply comments¹ on the above-styled proceeding and shows as follows:

I. The Citizens Companies

Citizens Utilities Company, through divisions and subsidiaries, provides telecommunications services, electric distribution, natural gas transmission and distribution and water and waste water treatment services to more than 1,600,000 customer connections in 20 states. The Citizens Companies' incumbent local exchange carriers (the "Citizens LECs") provide local exchange telephone services in suburban and rural exchange areas serving approximately 850,000 access lines in Arizona, California, Idaho, Montana, Nevada, New Mexico, New York, Oregon, Pennsylvania, Tennessee, Utah, and West Virginia. In addition, Citizens Telecommunications Company, a Citizens subsidiary, provides interexchange services throughout the nation including, as specifically relevant to this proceeding, interexchange services on traffic originating in the states where the

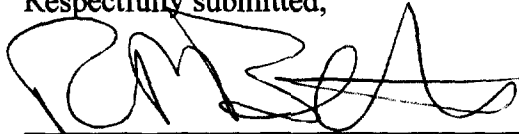
¹ Citizens Utilities Company did not file initial comments in this proceeding.

Citizens LECs operate. Finally, another Citizens subsidiary, Electric Lightwave, Inc., provides competitive local exchange and interexchange services in several Far Western states.

II. Position of the Citizens Companies

The Citizens Companies, some of which are just large enough to be subject to the present CAM and ARMIS filing requirements, concur in and endorse the proposals of Anchorage Telephone Utility and other commenters in this proceeding calling for rule modifications that would exempt incumbent local exchange carriers having less than two percent of the nation's access lines from CAM and ARMIS coverage. Mid-sized carrier compliance with the current CAM and ARMIS rules is expensive and burdensome and produces little of practical enforcement value.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. M. Tettelbaum', written over a horizontal line.

Richard M. Tettelbaum, Associate General Counsel

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November 5, 1996

CERTIFICATE OF SERVICE

I, Richard M. Tettelbaum, Associate General Counsel, Citizens Utilities Company, certify that on this 5th day of November, 1996, I served a copy of the foregoing "Reply Comments of the Citizens Utilities Companies" on all parties of record listed below by first class U.S. Mail, postage prepaid.



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